Final: 08/18/1999
Permit No.: V-2046

IMPERIAL COUNTY AIR POLLUTION CONTROL DISTRICT

150 S. Ninth Street
El Centro, CA 92243
(760) 339 4606

MAJOR FACILITY PERMIT REVIEW

Company Name:	SFPP, L.P.
Facility Name:	SFPP, L.P.
SIC Code:	4226 (Special Warehousing and Storage)
Source Type:	Refined Petroleum Bulk Terminal and Loading Facility.
Location:	345 W. Aten Road, Imperial, CA 92251
Responsible Official:	W. M. White
Plant Site Contact:	Dan Milan
Issuing Engineer:	Reyes Romero

TABLE OF CONTENTS

Introduction

Pursuant to Rule 900, of the Imperial County Air Pollution Control District Rules and Regulations, the District intends to issue a Title V Operating Permit to SFPP, L.P. The SFPP, L.P., Imperial Terminal, is a storage and bulk terminal facility for refined petroleum products. SFPP, L.P. consists of several gasoline, diesel and JP-5 storage tanks, three loading racks, and auxiliary equipment. The loading racks are equipped with a vapor processing system. Each tank and the vapor processing system operates under a different Authority to Construct permit number. The facility will operate under Title V Operating Permit number V-2046. The Operating Permit includes conditions to ensure that all Federal, State and District requirements will be satisfied.

Project Description

SFPP, L.P., Imperial Terminal, was constructed in 1957 and started operations in January 1958. This terminal receives fuels from Colton, California, through the Niland pipeline take off station. The facility operates a pipeline which delivers gasoline, diesel, jet turbine and military JP-5 into Imperial terminal large storage tanks. The gasoline and diesel are then loaded into tank trucks at two loading racks equipped with vapor processing system for resupply of surrounding communities.

The application was amended to include the Support Terminal Services fuel storage tanks, loading rack, and equipment which ownership was transferred to SFPP, L.P. recently. Support Terminal Services was a gasoline bulk terminal located at a contiguous property.
The facility also operates an emergency fire pump. A contractor operates a soil vapor extraction system that is permitted by the District.

Emission Units and Control Devices Description

Following is a description of each emission unit and control devices regulated by this permit:

Emission Unit	Design	Control Device	Product	Date Construction or Modification

Tank IP-2	External Floating Roof	Primary and Secondary Seals	Gasoline	1957
Tank IP-4	External Floating Roof	Primary and Secondary Seals	Gasoline	1957
Tank IP-5	External Floating Roof	Primary and Secondary Seals	Gasoline	1957
Tank IP-6	External Floating Roof	Primary and Secondary Seals	Gasoline	1958
Tank IP-8	External Floating Roof	Primary and Secondary Seals	Gasoline	1958
Tank IP-9	External Floating Roof	Primary and Secondary Seals	Gasoline	1961
Tank IP-10	External Floating Roof	Primary and Secondary Seals	Gasoline	1961
Tank IP-12	External Floating Roof	Primary and Secondary Seals	Gasoline	1962
Tank IP-13	Internal Floating Roof	Primary Seal	Gasoline	1964
Tank IP-14	Internal Floating Roof	Primary Seal	Gasoline	1964
Tank IP-16	Internal Floating Roof	Primary Seal	Gasoline	1964
Tank IP-19	Internal Floating Roof	Primary Seal	Gasoline	1957
Tank IP-20	External Floating Roof	Primary and Secondary Seals	Gasoline	1957
Tank IP-23	Internal Floating Roof	Primary Seal	Gasoline	1973
Tank IP-24	Internal Floating Roof	Primary Seal	Gasoline	1983

Tank IP-25	Internal Floating Roof	Primary Seal	Gasoline	1973
Tank IP-26	Internal Floating Roof	Primary Seal	Gasoline	1991
Two Loading Racks	Petroleum Products Loading System	NAO Vapor Processing System	Petroleum Vapors	1989
One Loading Rack	Petroleum Products Loading System	Zeeco Vapor Processing System	Petroleum Vapors	
IC Engine	Emergency Fire Pump	Turbocharger	Diesel I.C. Engine	1998
Red Dye Additive Tank	Aboveground, Tote System	None	Diesel Additive	1997
IPA-2 -Shell Additive	Aboveground, Fixed Roof.	Pressure Relief Valve	Gasoline Additive	1997
IP-A5 -Red Dye Additive Tank	Aboveground, Fixed Roof Tank, 75 Gallon	Pressure Relief Valve	Diesel Additive	1997
Vapor Extraction System	Soil Remediation System for Gasoline Contaminated Soils	I.C. Engine to Combust the Extracted Vapors	Propane Auxiliary Fuel	1998
IP-A11 Additive Tank	Internal Floating Roof	Primary Seal	Ethanol Additive	
IP-A12 Additive Tank	Internal Floating Roof	Primary Seal	Ethanol Additive	
IP-A7 Additive Tank, Community Additive	Aboveground, Fixed Roof Tank, 8000 Gallon	None	Additive	

IP-A9 Additive Tank	175 Gallon Horizontal Tank	None	Red Dye Diesel Additive	

Air Emissions

The principal air pollutant from this facility is volatile organic compounds (VOC). The main sources of these emissions, are the petroleum storage tanks, loading racks/vapor processing system and incremental emissions from piping fittings, sample house drains, etc.
The potential to emit for criteria and hazardous air pollutants were evaluated by SFPP, L.P. Air emissions were calculated using AP-42 emission factors and EPA/TANKS3.1 Software Program. Emission inventory was reviewed by this office and found in compliance with our methods and procedures.

a. The following criteria air pollutants are estimated to be emitted from the entire facility:

Pollutant	Tons/year
Volatile Organic Compounds (VOC)	138.0

b. The following hazardous air pollutants are estimated to be emitted from the entire facility:

Hazardous Air Pollutants	Tons/year
Hexane	0.5
Benzene	0.5
Toluene	0.6
Ethyl benzene	0.0
P-xylene	*

M-xylene	0.1*
O-xylene	*
2,2,4,trimethyl-pentane	0.2
MTBE	7.4
1,3-Butadiene	0.03

* P, M, O, xylenes combined

Current Emission Status:

SFPP, L.P. has submitted a Title V application for its terminal at Imperial, California. The facility has been determined a major source of emissions for Volatile Organic Compounds (VOC).

Applicable Requirement

According to the information submitted in the Title V application and the District review, the following are the Federal, State, and District requirements that apply to the facilities.

Applicable Requirement	Enforceability	Equipment Affected
Rule 111-Equipment Breakdown	Federal, District	All Facility
Rule 117-Nuisances	Federal, District	All Facility
Rule 201-Permits Required	Federal, District	All Facility
Rule 202-Exemptions	District	All Facility
Rule 207-Standards for Permit to Construct	Federal, District	All Facility
Rule 401-Opacity of Emissions	Federal, District	Vapor Processing System/I.C. Engine
Rule 403-Quantity of Emissions	Federal, District	Vapor Processing System/I.C. Engine
Rule 405-Sulfur Compounds	Federal, District	Vapor Processing System/I.C. Engine

Rule 406-Specific Contaminants	Federal, District	Vapor Processing System/I.C. Engine
Rule 413-Definitions	Federal, District	All Facilities
Rule 414-Storage of Organic Liquids at Terminals and Bulk Loading Facilities	Federal, District	Petroleum Product Storage Tanks
Rule 415.1- Gasoline Loading Into Tank Trucks and Trailers	Federal, District	Loading Racks/Vapor Processing System
Rule 416-Oil-Effluent Water Separator	Federal, District	Oil-Water Separator
40 CFR Part 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals	Federal, District	Loading Racks/Vapor Processing System
40 CFR Part 60, Subpart K, Standards of Performance for Storage Vessels for Petroleum Liquids.	Federal, District	Petroleum Product Storage Tanks IP-23 and IP-25.
40 CFR Part 60, Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids.	Federal, District	Petroleum Product Storage Tank IP-24.
40 CFR Part 60, Subpart Kb, Standards of Performance for Volatile Organic Liquids Storage Vessels.	Federal, District	Petroleum Product Storage Tank IP-26.

NSR Permit # 2046A -Emission Specifications 1. Permit does not authorize emissions in excess of Division 26, Part 4, Chapter 3, H&SC and District's Rules and Regulations. 2. Notification of any emergency, unscheduled emissions or equipment breakdown. 3-Emission Limits Stack Opacity 10% NOx 53 ppmv Hydrocarbons -90% Minimum Control -Monitoring. Performance Stack Test upon Request of the APCD -Reporting. Total Yearly Volume throughput of Gasoline and Diesel	 Federal, District Federal, District Federal, District Federal, District Federal, District	Loading Racks/ NAO Vapor Processing System
NSR Permit # 2729 True Vapor Pressure > 569 mmHg abs. Reimbursement of inspection cost Reporting-yearly volume throughput	 Federal, District District Federal, District	Tanks IPA-2 and IPA-5
NSR Permit # 2737 Emergency Fire Pump Operation 100 hours per year for maintenance Operation limited to emergencies Opacity 20% Installation of an hour meter Recordkeeping- hours of operation and routine maintenance Reporting-monthly fuel consumption and hours of operation	 District District Federal, District District District District	Emergency Fire Pump

NSR Permit # 2771 1. Permit Compliance 2. Reimbursement of Inspection Cost	 Federal, District District	Red Dye Tote
NSR Permit # 1767B 1. Compliance with Application 2. Compliance with Rules and Regulations 3. Permit does not authorize emissions in excess of Division 26, Part 4, Chapter 3, H&SC and District's Rules and Regulations. 4. Permittee shall not violate laws, ordinances, regulations, rules or statutes or other governmental agencies. 5.True Vapor Pressure > 569 mmHg abs. 6. Reimbursement of inspection cost 7. Primary ans Secondary seals inspection. 8. Reporting-yearly volume throughput	 Federal, District Federal, District Federal, District Federal, District Federal, District District Federal, District Federal, District	Tank IP-23

NSR Permit # 1768B 1. Compliance with Application 2. Compliance with Rules and Regulations 3. Permit does not authorize emissions in excess of Division 26, Part 4, Chapter 3, H&SC and District's Rules and Regulations. 4. Permittee shall not violate laws, ordinances, regulations, rules or statutes or other governmental agencies. 5.True Vapor Pressure > 569 mmHg abs. 6. Reimbursement of inspection cost 7. Primary ans Secondary seals inspection. 8. Reporting-yearly volume throughput	 Federal, District Federal, District Federal, District Federal, District Federal, District District Federal, District Federal, District	Tank IP-24
NSR Permit # 2045B 1. Compliance with Application 2. Compliance with Rules and Regulations 3. Permit does not authorize emissions in excess of Division 26, Part 4, Chapter 3, H&SC and District's Rules and Regulations. 4. Permittee shall not violate laws, ordinances, regulations, rules or statutes or other governmental agencies. 5.True Vapor Pressure > 569 mmHg abs. 6. Reimbursement of inspection cost 7. Primary ans Secondary seals inspection. 8. Reporting-yearly volume throughput	 Federal, District Federal, District Federal, District Federal, District Federal, District District Federal, District Federal, District	Tank IP-26

Permit to Operate # 538B - The thermal oxidizer shall be maintained in good working order at all times. District Notification. -Cond A. Emissions Specifications 1. Hydrocarbons -95% Minimum Control 2. Continuous temperature monitor. 3. Stack Opacity 10% -Cond B. Monitoring. 1. Annual Performance Stack. 2. APCD shall witness performance test. -Cond C. Inspection and Maintenance Inspection and maintenance plan. -Cond D. Equipment Breakdown Procedure. Breakdown procedure policy. -Cond E. Employee Training Procedures, compliance and notification policy. -Cond F. Reports Yearly volume terminal throughput of gasoline, diesel and other products.		Loading Rack/Zeeco Vapor Processing System
NSR Permit # 1769A 1. Equipment Compliance 2.True Vapor Pressure > 569 mmHg abs. 3. Rule 414 Compliance 4. Reimbursement of inspection cost 5. Reporting-yearly volume throughput	 Federal, District Federal, District Federal, District District Federal, District	Tank IP-A12

NSR Permit # 1767B 1. Compliance with Application 2. Compliance with Rules and Regulations 3. Permit does not authorize emissions in excess of Division 26, Part 4, Chapter 3, H&SC and District's Rules and Regulations. 4. Permittee shall not violate laws, ordinances, regulations, rules or statutes or other governmental agencies. 5.True Vapor Pressure > 569 mmHg abs. 6. Reimbursement of inspection cost 7. Primary ans Secondary seals inspection. 8. Reporting-yearly volume throughput	 Federal, District Federal, District Federal, District Federal, District Federal, District District Federal, District Federal, District	Tank IP-25
NSR Permit # 2540 1. Equipment Compliance 2.True Vapor Pressure > 569 mmHg abs. 3. Rule 414 Compliance 4. Reimbursement of inspection cost 5. Reporting-yearly volume throughput	 Federal, District Federal, District Federal, District District Federal, District	Tank IP-A11
NSR Permit#2744-Contracted Emissions Opacity 20% Install an hour meter to the engine Monitoring-Total hydrocarbon emissions Recordkeeping-hours of operation and routine maintenance to the engine Reporting-monthly total hydrocarbon emissions	 Federal, District Federal, District Federal, District Federal, District Federal, District	Soil Remediation
40 CFR, Part 82, Stratospheric Ozone Protection	Federal, District	Air Conditioning

Rule 900-Operating Permits	Federal, District	All Facility
Rule 517-Emergency Variance	State and District	All Facility
AB2588-Toxic Hot Spots Program	State and District	All Facility

Statement of Basis

The proposed Operating Permit includes conditions to ensure that all Federal, State and District requirements will be satisfied. Additionally, the permit has been designed to have adequate monitoring, recordkeeping and reporting requirements to demonstrate continuous compliance with the permit conditions.

The following provides additional clarification regarding certain permit changes and permit conditions.

1. 40CFR, Part 60, Subpart XX, sets limits for the operation of bulk gasoline terminals which constructed, modified or reconstructed after 12/17/1980. The facility operates one gasoline loading system equipped with a NAO vapor processing unit and a second gasoline loading system equipped with a Zeeco vapor processing unit. The NAO vapor processing unit was installed on July 5, 1989, and the Zeeco vapor processing unit was installed on March 15, 1989. The gasoline loading systems are subject to Subpart XX.

2. 40CFR, Part 60, Subparts K, Ka and Kb, set limits for the operation of storage vessels for petroleum liquids which constructed, modified or reconstructed after 06/11/1973. Tanks IP-1 through IP-16, including IP-19 and IP-20, were in operation before 1973. Therefore, these tanks are not subject to 40CFR, Part 60, Subparts K, Ka, and Kb. Tanks IP-17 and IP-18 were purchased by the facility on April 12, 1995. However, the facility has stated in its Title V application that these vessels will be operated for the service of Diesel. Diesel has a Reid vapor pressure of 0.1 psia; therefore, tanks IP-17 and IP-18 are exempt of Subparts K, Ka and Kb requirements.

   The gasoline storage tanks IP-23 and IP-25 were constructed during 1973. These tanks are subject to 40 CFR 60, Subpart K. These tanks are equipped with an internal floating roof and they were constructed to comply with all the specifications outlined in the NSPS. The gasoline storage tanks are operated and maintained in a manner consistent with the NSPS requirements.

The gasoline storage tank IP-24 was constructed during 1983; therefore, it is subject to the requirements of Subpart Ka. This tank is equipped with an internal floating roof and a liquid mounted resilient primary seal. This gasoline storage tank was designed to meet the specifications outlined in the NSPS and it is operated and maintained in a manner consistent with the NSPS requirements.

Tank IP-26 was constructed during 1991. This storage tank is subject to the requirements of Subpart Kb. This tank is equipped with an internal floating roof and a liquid mounted resilient primary seal. This gasoline storage tank was designed to meet the specifications outlined in the NSPS and it is operated and maintained in a manner consistent with the NSPS requirements.

3. The gasoline storage tanks IP-23, IP-24, IP-25, and IP-26 are required to comply with the requirements of SIP Rule 414. SIP Rule 414 incorporates most of the requirements of 40 CFR Part 60, Subparts K, Ka and Kb. In order to avoid repetition of the conditions in the Title V Operating Permit, the requirements of 40 CFR Part 60, Subparts K, Ka and Kb will be subsumed, as applicable, according to the table presented below. All of the requirements of these regulations are currently federally enforceable, therefore, by streamlining these conditions we are not creating new federally enforceable requirements. Those requirements that are not covered by SIP Rule 414 and that are mandated by a Subpart, as presented in the table below, will be incorporated in the Title V Operating Permit in separate conditions. These requirements will be applicable only to the storage tank to which the corresponding subpart is suitable and the conditions will be labeled in the Title V Operating Permit as {IP-XX }.

ICAPCD Rule 414 Gasoline Storage Tanks IP-23, IP-24, IP-25, and IP-26.	**40 CFR Part 60, Subpart K. Gasoline Storage Tank IP-23 and IP-25**	**40 CFR Part 60, Subpart Ka. Gasoline Storage Tank IP-24.**	**40 CFR Part 60, Subpart Kb. Gasoline Storage Tank IP-26.**
414(a) No person shall store or hold in any stationary tank of more than 39,630 gallon, any organic liquid having a true vapor pressure of 1.5 psi absolute or greater unless such tank is equipped with a fix roof with an internal-floating-type cover.	60.112(a)(1)	60.112a(a)(2)	60.112b(a)(1)

Not Applicable	Not Applicable	60.112a(a)(2) The cover shall be floating on the surface of the liquid at all times.	60.112b(a)(1)i
414(a)(2) The fix roof tanks with an internal-floating-roof shall be equipped with a closure device between the wall of the storage tank and the edge of the internal floating roof.	Not Applicable	Not Applicable	60.112b(a)(ii)(A)
Not Applicable	Not Applicable	60.112a(a)(2)	60.112b(a)(1)(iil) All openings in the roof except pressure-vacuum valves, which shall be set to within ten percent of the maximum allowable working pressure of the roof and shall provide a projection below the liquid surface.
Not Applicable	Not Applicable	60.112a(a)(2)	60.112b(a)(1)(iv) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains are to be equipped with a cover or lid which is to be maintained in a closed position at all times except when the device is in actual use. The cover or lid shall be equipped with a gasket. Cover on each access hatch and automatic gauge float well shall be bolted except when they are in use.
Not Applicable	Not Applicable	60.112a(a)(2)	60.112b(a)(1)(v) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

Not Applicable	Not Applicable	60.112a(a)(2)	60.112b(a)(1)(vi) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended settings.
Not Applicable	Not Applicable	Not Applicable	60.112b(a)(1)(vii) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
Not Applicable	Not Applicable	Not Applicable	60.112b(a)(1)(viii) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
Not Applicable	Not Applicable	Not Applicable	60.112b(a)(1)(ix) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
Not Applicable	Not Applicable	Not Applicable	60.113b(a)(2) The permittee shall visually inspect the internal floating roof through manholes and roof hatches on the fixed roof at least once every 12 months after initial fills. The permittee shall make any repairs or empty and remove the tank from service within 45 days of problem detection.

Not Applicable	Not Applicable	Not Applicable	60.113b(a)(4) Visually inspect the internal floating roof, the primary seal, gaskets, slotted membranes and sleeve seals (in any) each time the storage vessel is emptied and degassed. Inspections shall be conducted at intervals not greater than 10 years.
Not Applicable	Not Applicable	Not Applicable	60.113b(a)(5) The APCD shall be notified at least 30 days prior to the filling or refilling of each tank for an APCD observer is present during inspection of the tank.
414(a)(5) The permittee shall keep an accurate record of liquids stored in such containers and the true vapor pressure ranges of such liquids.	60.113(a)	60.115a(a)	60.116b(c)
414(a)(5) The true vapor pressure in psi absolute of stored liquids may be determined by using the nomographs contained in American Petroleum Institute Bulletin 2517 for conversion of Reid vapor pressure to true vapor pressure.	60.113(b)	60.115a(b)	60.116(c)(2)

4. 40CFR, Part 63, Subpart R, National Emission Standards for Gasoline Distribution, sets limits for the operation of bulk gasoline terminals. The provisions of this subpart apply to any bulk gasoline terminals which is a major source, or is located within a contiguous area and under the common control of a facility that is a major source. For the purpose of 40CFR, Part 63, a major source means any stationary source located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutants or 25 tons per year or more of any combination.

   According to the emission inventory presented in the Title V application, SFPP, L.P. is not a major source of emissions of any single hazardous air pollutant, or

combination of pollutants. This facility is not subject to the requirements of 40CFR, Part 63. The facility shall keep records of applicability determination as specified in 63.10(b)(3).

5. Several emission units are exempted from Title V Operating Permit requirements based on District's Rule 202, Exemptions (White Paper Number 2 for Improved Title V Implementation). Rule 202 was revised by the District on September 7, 1993. The revised Rule has been submitted to EPA as a SIP revision. The emission units exempted and bases for exemption are listed in the Insignificant Activities section.

6. SFPP, L.P. has contracted Tait Environmental Management from Orange, California, to install and operate a soil remediation system for gasoline contaminated soil at its premises. The soil remediation system is projected to operate in a temporary base until completion of the project. The source is not a major source by itself; however, volatile organic compounds emissions from the project will contribute to increase the emission inventory for the facility.

7. The facility operates an emergency Fire Pump, driven by a Detroit Diesel Engine, 160 BHP. Fire suppression systems may be treated as "trivial" activities; therefore, no federally enforceable operating limits need to be imposed for the operation of this equipment. However, the operating District Rules and Regulation require all internal combustion engines with a manufacturer's maximum rating above 50 brake horsepowers to obtain an Authority to Construct and Permit to Operate. The Authority to Construct conditions for the fire pump will be labeled "District-Only" enforceable in the Title V Operating Permit with exemption of the 20% opacity limit which comes from the SIP Rule 401.

8. The facility is required to conduct a performance test to the NAO thermal oxidizer unit for volatile organic compounds and nitrogen oxides emissions 30 days after started operations and upon request of the ICAPCD thereafter (ATC permit 2046A, Monitoring). The first performance test was conducted in September 29, 1989. The vapor processing system was found in compliance with the volatile organic compounds, nitrogen oxides, and lead limits. Thereafter, the vapor processing system has been tested during the following dates: August 18, 1994, and October 25, 1995. The vapor processing system was found in compliance with all the parameters tested. The facility will be required to demonstrate compliance with the volatile organic compounds and nitrogen oxides limits by an annual performance test to the NAO vapor processing unit (ICAPCD Rule 900.F.2, Procedures for Issuing Permit to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990).

9. The Authority to Construct Permit 538A was revised by the District and conditions were undated on October 9, 1995. The Permit to Operate 538B has been used in lieu of the preconstruction permit and it assures compliance of the thermal oxidizer with the SIP-Rules requirements; therefore, Permit to Operate 538B and conditions will be incorporated into the Operating Permit as federally enforceable.

   The Permit to Operate # 538B, Condition C, Inspection and Maintenance plan; Condition D, Equipment Breakdown Procedure policy; and Condition E, Employee Training policy were included in the Permit to Operate as part of a settlement agreement arrangement. These requirements are not part of any Federal, State or SIP District Regulation; therefore, these conditions are not federally enforceable. The permittee complied with the requirements of conditions C, D, and E which they are no longer required to comply with. These conditions will not be carried into the Title V Operating Permit due to the unnecessary and outdated status of these requirements (DRAFT California White Paper for Title V Implementation, October 25, 1995).

10. SIP Rule 405, Sulfur Compounds, requires to comply with a 0.2 percent by volume emission limit for sulfur compounds, calculated as sulfur dioxide, from the vapor processing units. The facility agreed to monitor sulfur dioxide emissions as a part of its annual performance test for the vapor processing units. U.S. EPA Method 6 will be required to monitor sulfur dioxide emissions.

11. SFPP, L.P. will demonstrate compliance with the 10% opacity limit of the Authority to Construct Permits for the NAO and Zeeco thermal oxidizers using U.S. EPA Method 22. Daily inspections will be conducted while the equipment is operating and during daylight hours. If any visible emissions, excluding condensed water vapor, are detected during an inspection and the emissions are observed continuously or intermittently for 3 minutes, the permittee will take corrective actions that eliminate the visible emissions and report the visible emission as a potential exceedance. If all visible emissions are not eliminated through corrective actions within 24 hours, the permittee will have a CARB-certified smoke-reader determine compliance with the opacity standard, using EPA Method 9.

12. Authority to Construct Permit Requirement Exclusion.

    ATC permit 2046A, condition 3 (Emission Specification), for the vapor processing system, limits the emissions of nitrogen oxides to 53 ppmv and 1 ton per year. The vapor processing system is also limited to 0.5 tons per year of lead. The vapor processing system was found in compliance with both of the nitrogen oxides limits during the performance test conducted in September 29, 1989. However, the

potential to emit for the vapor processing system based on the 53 ppmv limit is not consistent with the 1 ton per year limit. Also, a limit was set for emission of lead from the NAO vapor processing system because lead was used as a gasoline additive before 1994. Because lead is not longer used as a gasoline additive(CCR, Title 13, Division 3, Chapter 5, Citation: Section 2255.4), an emission limit for lead is no longer necessary. The 1 ton per year nitrogen oxide and the 0.5 tons per year lead limits do not come from any Federal, State or SIP District regulation. The facility has requested to be released from these limits based on the unnecessary and outdated status of these requirements (DRAFT California White Paper for Title V Implementation, October 25, 1995). The exclusion of the 1 ton per year nitrogen oxide limit from the Operating Permit will not increase the NOX emissions to a level which triggers any limit in a Federal, State or SIP District regulation. The 1 ton per year limit will be superseded by the 53 ppmv. The 53 ppmv limit will remain to restrict the NOX emission concentration throughout the stack.

The ATC permit 2046A, condition 3, will be amended following the District's NSR procedures to release the facility of the 1 ton per year nitrogen oxide and 0.5 ton per year lead emission limits and monitoring. Public notice of these amendments will be published along with the Operating Permit.

13. Authority to Construct Permit Requirement Change

ATC permit 2046A, condition 7 (Monitoring), for the vapor processing system, requires to submit a report of a performance test conducted upon request of the APCD within 21 days after the performance test is conducted. This requirement is not part of any Federal, State or SIP District Regulation, therefore, the reporting period will be extended to 60 days after the performance test is conducted.

The ATC permit 2046A, condition 7, will be amended following the District's NSR procedures. Public notice of this amendment will be published along with the Operating Permit.

14. Federal Enforceablity of Authority to Construct Conditions.

The following Authority to Construct Permit Conditions require the permittee to reimbuse the ICAPCD for the cost of any additional inspections performed by the District and inspectors under contract: 2729, Cond 4 (IPA-2 and IPA-5); 2771, Cond 3 (Red Dye Tote), 1767B, Cond 6 (IP-23); 1768B, Cond 6 (IP-24); 1766B, Cond 6 (IP-25); 1769B, Cond 6 (IP-A12); 2145B, Cond 6 (IP-26); 2540, Cond 4 (IP-A11). This requirement is not part of any Federal, State or SIP District Regulation, therefore, these conditions are not considered federal enforceable and they will not

be included in the Title V Operating Permit.

Insignificant Activities

The following types of activities and emission units will be exempted from the Title V permit requirements.

1. Oil Water Separator. Underground gravity separator will be exempted based on rule 202.B. Due to the low volatility of lube oil, vapor pressure < 0.1 psia, uncontrolled emissions do not exceed 2 pounds in any 24-hours period.

2. Storage Tank IP-1, JP-5 aboveground storage tank, Consolidated Western Steel, External Floating Roof, 80 ft Dia., 48 ft Height, 1,806,000 Gallons Capacity, Welded Shell, Pontoon Roof, Double Seal. JP-5 storage tanks will be exempted due to the low volatility of JP-5, vapor pressure < 0.1 psia. Exemption is based on Rule 202.E.8.c and the guidelines on Title V Operating Permit Program Submittal, Attachment "C", List of Trivial Activities.

3. Storage Tank IP-3, Diesel aboveground storage tank, Consolidated Western Steel, Fixed Roof, 67 ft Dia., 40.5 ft Height, 1,002,305 Gallons Capacity, Welded Shell, Cone Roof. Diesel storage tanks will be exempted due to the low volatility of diesel, vapor pressure < 0.1 psia. Exemption is based on Rule 202.E.8.c and the guidelines on Title V Operating Permit Program Submittal, Attachment "C," List of Trivial Activities.

4. Storage Tank IP-11, Diesel aboveground storage tank, Pittsburgh-Des Moines, Fixed Roof, 46.5 ft Dia., 40 ft Height, 472,461 Gallons Capacity, Welded Shell, and Cone Roof. Diesel storage tanks will be exempted due to the low volatility of diesel, vapor pressure < 0.1 psia. Exemption is based on Rule 202.E.8.c and the guidelines on Title V Operating Permit Program Submittal, Attachment "C", List of Trivial Activities.

5. Storage Tank IP-15, Diesel aboveground storage tank, Chicago Bridge & Iron, Fixed Roof, 49.8 ft Dia, 49 ft Height, 690,406 Gallons Capacity, Welded Shell, and Cone Roof. Diesel storage tanks will be exempted due to the low volatility of diesel, vapor pressure < 0.1 psia. Exemption is based on Rule 202.E.8.c and the guidelines on Title V Operating Permit Program Submittal, Attachment "C", List of Trivial Activities.

6. Storage Tank IP-17, Diesel aboveground storage tank, General American

Transmission, Internal Floating Roof, 48 ft Dia., 48 ft Height, 646,800 Gallons Capacity, Welded Shell, Pan Roof, and double seal. Diesel storage tanks will be exempted due to the low volatility of diesel, vapor pressure < 0.1 psia. Exemption is based on Rule 202.E.8.c and the guidelines on Title V Operating Permit Program Submittal, Attachment "C", List of Trivial Activities.

7. Storage Tank IP-18, Diesel aboveground storage tank, General American Transmission, Internal Floating Roof, 80 ft Dia., 48 ft Height, 1,030,344 Gallons Capacity, Welded Shell, Pan Roof, and double seal. Diesel storage tanks will be exempted due to the low volatility of diesel, vapor pressure < 0.1 psia. Exemption is based on Rule 202.E.8.c and the guidelines on Title V Operating Permit Program Submittal, Attachment "C", List of Trivial Activities.

8. Storage Tank IP-21, Diesel aboveground storage tank, GATX, Internal Floating Roof, 55 ft Dia., 48 ft Height, 817,617 Gallons Capacity, Welded Shell. Diesel storage tanks will be exempted due to the low volatility of diesel, vapor pressure < 0.1 psia. Exemption is based on Rule 202.E.8.c and the guidelines on Title V Operating Permit Program Submittal, Attachment "C", List of Trivial Activities.

9. Storage Tank IP-22, Diesel aboveground storage tank, GATX, Internal Floating Roof, 66 ft Dia., 40 ft Height, 972,609 Gallons Capacity, Welded Shell. Diesel storage tanks will be exempted due to the low volatility of diesel, vapor pressure < 0.1 psia. Exemption is based on Rule 202.E.8.c and the guidelines on Title V Operating Permit Program Submittal, Attachment "C", List of Trivial Activities.

10. Portable Welder. Welding equipment which does not result in emission of HAP metals will be exempted based on the guidelines on Title V Operating Permit Program Submittal, Attachment "C", List of Trivial Activities.

11. Diesel Pump. Foam proportioning unit for fire suppression system driven by diesel engine with a rating less than 50 bhp. Fire suppression system will be exempted based on the guidelines on Title V Operating Permit Program Submittal, Attachment "C", List of Trivial Activities.

12. Portable Generator. Power generator unit driven by diesel engine with a rating less than 50 bhp. Power generator with a rating of 50 bhp or less will be exempted based on Rule 202.E.1.a. and the guidelines on Title V Operating Permit Program Submittal, Attachment "C", List of Trivial Activities.

13. Spray Washer. Spray washer unit for plant maintenance and upkeep activities driven by a gasoline engine with a rating less than 50 bhp. Plant maintenance and

upkeep activities will be exempted based on the guidelines on Title V Operating Permit Program Submittal, Attachment “C”, List of Trivial Activities.

14. Pensky Marten Unit. Flash point analyzer used for quality control/assurance or inspection purposes will be exempted based on the guidelines on Title V Operating Permit Program Submittal, Attachment “C”, List of Trivial Activities.

15. Water Heater. Water heaters with a rating less than 3 MMBTU/hr for boiler water treatment operations will be exempted based on the guidelines on Title V Operating Permit Program Submittal, Attachment “C”, List of Trivial Activities.

16. Solvent part cleaners. Rule 202.E.9.b exempts unheated nonconveyorized cleaning equipment with a surface area less than 1.0 sq.m., using organic solvents with an initial boiling point of 160 C or greater, and losing less than 25 gal/yr of solvent to the atmosphere. The solvent used at the cleaning station has an initial boiling point of 177 C, the area is smaller than 1 sq.m., and loses are less than 25 gal/yr.

17. Line Markers and Painting activities. Plant maintenance and upkeep activities, such as painting, will be exempted based on the guidelines on Title V Operating Permit Program Submittal, Attachment “C”, List of Trivial Activities.

18. Repair and maintenance. The repair and maintenance shop activities not related to the source’s primary business activities will be exempted based on the guidelines on Title V Operating Permit Program Submittal, Attachment “C”, List of Trivial Activities.

19. High Pressure Washer. Steam pressure cleaner for steam cleaning operations will be exempted based on the guidelines on Title V Operating Permit Program Submittal, Attachment “C”, List of Trivial Activities.

20. Gasoline Additive Storage Tank. Aboveground storage tank, 5,777 Gallons Capacity. A gasoline additive storage tank will be exempted due to the high initial boiling point (381.2F) and the low volatility, vapor pressure 0.1 mmHg, of this substance. Exemption is based on Rule 202.E.8.c and the guidelines on Title V Operating Permit Program Submittal, Attachment “C”, List of Trivial Activities.

Supplemental Annual Fee

The supplemental annual fee for the facilities will be determined according to the guidelines of Rule 900.G. The supplemental annual fee will be calculated according to the following equation:

s = [$ 32.65 per ton (CPI adjusted) x e] - f

where:

s =supplemental annual fee in dollars

e = fee-based emissions in tons per year

Actual rate of emissions for which fee-based emission schedule applies:

Volatile Organic Compounds	= 68.8
HAPs	= 5.6
Total	74.4

f = sum (in dollars) of annual fees under Regulation III and AB2588:

Tank IP-2	= $ 1,728.00
Tank IP-4	= $ 1,296.00
Tank IP-5	= $ 1,296.00
Tank IP-6	= $ 864.00
Tank IP-8	= $ 1,296.00
Tank IP-9	= $ 864.00
Tank IP-10	= $ 864.00
Tank IP-12	= $ 864.00
Tank IP-13	= $ 864.00
Tank IP-14	= $ 1,296.00
Tank IP-16	= $ 1,296.00
Tank IP-19	= $ 648.00
Tank IP-20	= $ 648.00
Tank IP-23	= $ 1,296.00
Tank IP-24	= $ 864.00
Tank IP-25	= $ 1,296.00
Tank IP26	= $ 1,728.00
Tank IP-A2 & A5	= $ 324.00
Tank IP-A11	= $ 324.00

Tank IP-A12	= $ 151.50
NAO Thermal Oxidizer	= $ 1,296.00
Zeeco Thermal Oxidizer	= $ 1,296.00
Fire Pump	= $ 105.00
TOTAL	= $22,504.50

Total Emissions of Fee Pollutants:	74.4 tons/yr
Emissions of Fee Pollutants x $ 32.65/ton:	$ 2,429.16
Annual Fees under Reg.III	$ 22,504.50
Estimated supplemental Title V Program Fee:	(2,429.16 - 22,504.50) = $ 0.00

These calculations indicate that the annual fee paid by the facilities under Regulation III exceeds the emission fee pollutant schedule under Rule 900 therefore no supplemental fee is required.